

Facility Name: **Norbord Georgia LLC - Cordele**

City: Cordele

County: Crisp

AIRS #: 04-13-08100054

Application #: 718902

Date SIP Application Received: December 20, 2022

Date Title V Application Received: December 20, 2022

Permit No: 2493-081-0054-V-06-1

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
2493-081-0054-V-06-0	March 18, 2021	Administrative Amendment for ownership change

B. Regulatory Status**1. PSD/NSR/RACT**

Norbord Georgia LLC – Cordele (Norbord) is classified as a major source of air emissions according to the new source review (NSR) prevention of significant deterioration of air quality (PSD) regulations. The facility is major for all criteria pollutants, except sulfur dioxide, because the potential to emit (PTE) particulate matter, nitrogen oxides, carbon dioxide, and volatile organic compounds is each greater than the PSD major source threshold of 250 tons per year (ton/yr).

Note: The manufacture of Oriented Strand Board (OSB) is not one of the 28 named categories whose major source threshold is 100 ton/yr.

Conditions 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.17, 3.3.19, 3.3.20, 3.3.21, 3.3.22, 3.3.23, 3.3.24, 3.3.25, 3.3.26, 3.3.27, 3.3.28, 3.3.29, 3.3.30, 3.3.31, 3.3.32, 3.3.33, 3.3.34, and 3.3.35 are either PSD avoidance or PSD limits.

2. Title V Major Source Status by Pollutant**Table 2: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes	✓		
PM ₁₀	Yes	✓		
PM _{2.5}	Yes	✓		
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes	✓		

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
CO	Yes	✓		
TRS				
H ₂ S				
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

II. Proposed Modification

A. Description of Modification

The facility is seeking authorization to make the following changes:

- Change the name of the facility from West Fraser Cordele to Norbord Georgia LLC – Cordele; [Note that the facility was also known previously as Norbord Georgia, Inc. – Cordele]
- Replace two existing Line 1 triple-pass rotary dryers with two single-pass rotary dryers;
- Replace the existing stranders with equivalent stranders; and
- Replace the existing Line 1 APA Roller Stamp with a robotic ink jet unit.

In addition, the Division has incorporated the applicable Plywood and Composite Wood Products (PCWP) MACT rule, 40 CFR Part 63, Subpart DDDD changes finalized on August 13, 2020 into the existing Title V operating permit.

B. Emissions Change

Due to the replacement of the two triple-pass dryers with two new single-pass dryers, a prevention of significant deterioration analysis was performed to determine whether any emission increase of a regulated pollutant exceeds the significant emission rate threshold. The emission increase from the replacement of the Line 1 stranders was not considered because the stranders exhaust inside the building. The replacement of the Line 1 Roller Stamp by the new robotic ink jet unit will result in a reduction in ink usage because of the precise manner in which the ink is applied. Operation of the ink jet printing unit will remain an insignificant air emissions source because the ink does not contain VOCs and/or HAPs. However, the ink does contain acetone, which is regulated as a toxic air pollutant (TAP) by GA EPD. The minimum emission rate (MER) for acetone is 278,000 lb/yr. The facility-wide emissions will remain below the MER for acetone; therefore, no further analysis is required. Note that the replacement of the dryers will not result in an increase in dryer capacity, facility production capacity, or potential emissions.

There are four dryers on Line 1 (ID Nos. RD01, RD02, RD03, and RD04). Two dryers (ID Nos. RD01 and RD02) are being replaced. The “actual-to-potential” approach is used to calculate the total Project emissions increase. The potential to emit (PTE) is the maximum capacity of the dryers to emit a

pollutant under its physical and operational design. PTE can be calculated from the maximum oven dried tons of wood flakes dried in the four dryers and the pound(s) of regulated pollutant emitted per oven dried ton. The actual emission is the baseline actual emission (BAE). BAE is the average rate, in tons per year (ton/yr), at which the emissions unit actually emitted each regulated pollutant during any consecutive 24-month period selected by the owner or operator within the 10-year period immediately preceding either the date the owner or operator begins actual construction of the Project, or the date a complete permit application is received by the Division. The project emission increase for each regulated pollutant is the difference between the PTE and the BAE.

The tables below show the PTE and the BAE for the dryers. The PTE for the dryers was based on a drying capacity of 332,880 oven dry tons per year (ODT/yr). The emission factors are after control and were obtained through performance testing conducted in 2009 (see footnotes below the PTE table). Note that the dryers 24-month used for the BAE is the period 2017 through 2018.

SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

Norbord - Cordele																
Throughput		332,880 ODT/yr														
Dryer Emissions																
Pollutant	Emission Factor ¹		Combined Dryers (RD01A, RD02A, RD03, RD04)						RTO1 (ID: C11A)				RTO2 (ID: C11B)			
			Uncontrolled Emissions		Control Efficiency ³	Controlled Emissions		Uncontrolled Emissions		Controlled Emissions		Uncontrolled Emissions		Controlled Emissions		
			lb/hr	tpy		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	
PM/PM ₁₀	0.383	lb/ODT	145.4	637.0	90%	14.54	63.70	72.72	318.51	7.27	31.85	72.72	318.51	7.27	31.85	
PM _{2.5} ²	0.306	lb/ODT	116.4	509.6	90%	11.64	50.96	58.18	254.81	5.82	25.48	58.18	254.81	5.82	25.48	
SO ₂	3.240	lb/hr	3.240	14.191		3.24	14.19	1.62	7.10	1.62	7.10	1.62	7.10	1.62	7.10	
NO _x	0.985	lb/ODT	37.44	164.0		37.44	163.99	18.72	81.99	18.72	81.99	18.72	81.99	18.72	81.99	
CO	2.037	lb/ODT	77.40	339.0		77.40	339.01	38.70	169.51	38.70	169.51	38.70	169.51	38.70	169.51	
CO ₂	670.000	lb/ODT	25,460.0	111,514.8		25,460.0	111,514.8	12,730.0	55,757.4	12,730.0	55,757.4	12,730.0	55,757.4	12,730.0	55,757.4	
VOC	0.189	lb/ODT	144.00	630.7	95%	7.20	31.5	72.00	315.36	3.60	15.77	72.00	315.36	3.60	15.77	
Formaldehyde	3.13E-01	lb/ODT	11.875	52.013	90%	1.1875	5.2013	5.94	26.01	0.59	1.73	5.94	26.01	0.59	2.60	
Methanol	2.50E-01	lb/ODT	9.500	41.610	90%	0.9500	4.1610	4.75	20.81	0.48	1.39	4.75	20.81	0.48	2.08	
Acetaldehyde	2.13E-01	lb/ODT	8.075	35.369	90%	0.8075	3.5369	4.0375	17.6843	0.4038	1.7684	4.0375	17.6843	0.4038	1.7684	
Acrolein	9.25E-02	lb/ODT	3.515	15.396	90%	0.3515	1.5396	1.7575	7.6979	0.1758	0.7698	1.7575	7.6979	0.1758	0.7698	
Naphthalene	4.25E-04	lb/ODT	0.016	0.071	90%	0.0016	0.0071	0.0081	0.0354	0.0008	0.0035	0.0081	0.0354	0.0008	0.0035	
Phenol	2.50E-02	lb/ODT	0.950	4.161	90%	0.0950	0.4161	0.4750	2.0805	0.0030	0.2081	0.4750	2.0805	0.0475	0.2081	
Propionaldehyde	1.75E-02	lb/ODT	0.665	2.913	90%	0.0665	0.2913	0.3325	1.4564	0.0333	0.1456	0.3325	1.4564	0.0333	0.1456	
Toluene	1.00E-03	lb/ODT	0.038	0.166	90%	0.0038	0.0166	0.0190	0.0832	0.0019	0.0083	0.0190	0.0832	0.0019	0.0083	
Xylene	6.25E-04	lb/ODT	0.024	0.104	90%	0.0024	0.0104	0.0119	0.0520	0.0012	0.0052	0.0119	0.0520	0.0012	0.0052	
Total HAP	---	---	34.7	151.8		3.47	15.18	17.33	75.90	1.69	6.03	17.33	75.90	1.73	7.59	
1. Emission Factors are based on the following: PM, VOC, NO _x and CO: Based on testing of results from 2009, including a 20% safety factor for PM, VOC, CO and NO _x , respectively. PM _{2.5} : 80% of PM emissions based on NCASI Wood Products Emission Factor database 2013 for rotary dryers. SO ₂ : Based on testing of similar Norbord RTOs in Solway, MN including a 20% safety factor. CO ₂ : AP-42 Table 10.6.1-2 Emission Factors for OSB Dryers. Formaldehyde, methanol, acetaldehyde, acrolein, naphthalene, phenol, and propionaldehyde emission factor from NCASI Chemical Specific Information for Panel Plants, Issued 2021, updated March 2014. Table 1 OSB Rotary Dryer mean emissions rate (lb/ODT) plus a 25% safety factor. Toluene and xylene emission factor from NCASI Technical Bulletin No. 772, January 1999, "Volatile Organic Compound Emissions from Wood Products Manufacturing Facilities," Part V- Oriented Strandboard plus a 25% safety factor.																
2. PM _{2.5} is assumed to be equal to PM ₁₀																
3. Control Efficiencies Assumed From: EPA Air Pollution Control Technology Fact Sheet Regenerative Incinerator and Air Pollution Control Technology Fact Sheet Wet Electrostatic Precipitator																
EPA RTO Fact Sheet																
EPA WESP Fact Sheet																

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Norbord - Cordele													
Description	Control Device	Replacement Dryer PTE After Control (tons/year)											
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	NO _x	VOCs	Lead	Formaldehyde	Methanol	Phenol	Total HAPs
Rotary Dryers 1- 4	RTO1 (C11A), RTO2 (C11B), WESP1	63.70	63.70	50.96	14.19	339.01	163.99	31.54	--	5.20	4.16	4.16E-01	15.18
Facility Totals		63.7	63.7	51.0	14.2	339.0	164.0	31.5	0.00E+00	5.20	4.2	0.4	15.2
Description	Control Device	2017 Actuals (ton/year)											
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	NO _x	VOCs	Lead	Formaldehyde	Methanol	Phenol	Total HAPs
Rotary Dryers 1- 4	RTO1 (C11A), RTO2 (C11B), WESP1	54.61	54.61	43.69	12.17	290.62	140.58	27.03	--	4.09	3.27	0.33	11.93
2017 Totals		54.6	54.6	43.7	12.2	290.6	140.6	27.0	0.00E+00	4.09	3.3	0.3	11.9
Description	Control Device	2018 Actuals (ton/year)											
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	NO _x	VOCs	Lead	Formaldehyde	Methanol	Phenol	Total HAPs
Rotary Dryers 1- 4	RTO1 (C11A), RTO2 (C11B), WESP1	52.65	52.65	42.12	11.73	280.21	135.54	26.07	--	4.03	3.22	0.32	11.76
2018 Totals		52.7	52.7	42.1	11.7	280.2	135.5	26.1	0.00E+00	4.03	3.2	0.3	11.8
Description	Control Device	2019 Actuals (ton/year)											
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	NO _x	VOCs	Lead	Formaldehyde	Methanol	Phenol	Total HAPs
Rotary Dryers 1- 4	RTO1 (C11A), RTO2 (C11B), WESP1	43.32	43.32	34.65	9.65	230.52	111.51	21.44	--	3.33	2.67	0.27	9.72
2019 Totals		43.3	43.3	34.7	9.6	230.5	111.5	21.4	0.00E+00	3.33	2.7	0.3	9.7
Description	Control Device	2020 Actuals (ton/year)											
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	NO _x	VOCs	Lead	Formaldehyde	Methanol	Phenol	Total HAPs
Rotary Dryers 1- 4	RTO1 (C11A), RTO2 (C11B), WESP1	12.95	12.95	10.36	2.89	68.94	33.35	6.41	--	0.93	0.74	0.07	2.72
2020 Totals		13.0	13.0	10.4	2.9	68.9	33.3	6.4	0.00E+00	0.93	0.7	0.1	2.7
Description	Control Device	2021 Actuals (ton/year)											
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	NO _x	VOCs	Lead	Formaldehyde	Methanol	Phenol	Total HAPs
Rotary Dryers 1- 4	RTO1 (C11A), RTO2 (C11B), WESP1	49.47	49.47	39.58	11.02	263.28	127.35	24.49	--	3.24	2.59	0.26	9.46
2021 Totals		49.5	49.5	39.6	11.0	263.3	127.4	24.5	0.00E+00	3.24	2.6	0.3	9.5
Description	Control Device	Maximum 2-yr average (tpy)											
		PM	PM ₁₀	PM _{2.5}	SO ₂	CO	NO _x	VOCs	Lead	Formaldehyde	Methanol	Phenol	Total HAPs
Rotary Dryers 1- 4	RTO1 (C11A), RTO2 (C11B), WESP1	53.63	53.63	42.90	11.95	285.41	138.06	26.55	--	4.06	3.25	0.32	11.84
Total		53.63	53.63	42.90	11.95	285.41	138.06	26.55	0.00	4.06	3.25	0.32	11.84
Baseline to Projected PTE Difference		10.07	10.07	8.06	2.24	53.60	25.93	4.99	0.00	1.14	0.91	0.09	3.34
Over SER?		no	no	no	no	no	no	no	no	--	--	--	--

Project Potential Emissions

Pollutant	Uncontrolled Emissions (lb/hr)	Uncontrolled Emissions (ton/yr)	Controlled Emissions (lb/hr)	Controlled Emissions (ton/yr)
PM/PM ₁₀	145.44	637.03	14.54	63.70
PM _{2.5}	116.35	509.62	11.64	50.96
SO ₂	3.24	14.19	3.24	14.19
NO _x	37.44	163.99	37.44	163.99
CO	77.40	339.01	77.40	339.01
VOC	144.00	630.70	7.20	31.50
Single HAP (Formaldehyde)	11.88	52.01	1.19	5.20
Total HAPs	34.66	151.80	3.47	15.18

C. PSD/NSR Applicability

The table below indicates that the project is not a significant modification because the emission increase of every pollutant is less than the significant emission rate for that pollutant. Therefore, PSD is not triggered.

Pollutant	Baseline Actual (ton/yr)	PTE (ton/yr)	PTE to Baseline Actual (ton/yr)	Significant Emission Rate (ton/yr)	PSD Significant?
PM	53.63	63.70	10.07	25	No
PM ₁₀	53.63	63.70	10.07	15	No
PM _{2.5}	42.90	50.96	8.06	10	No
SO ₂	11.95	14.19	2.24	40	No
CO	285.41	339.01	53.60	100	No
NO _x	138.06	163.99	25.93	40	No
VOC	26.55	31.54	4.99	40	No
Lead (Pb)	0.00	0.00	0.00	0.6	No

IV. Regulated Equipment Requirements

A. Brief Process Description

The purpose of the process is to dry the wood flakes in the rotary dryers to reduce the moisture content in preparation for the downstream gluing and pressing operations.

B. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
RD01	Wood Flake Rotary Dryer #1 [Line 1 Single-Pass Dryer]	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b) 40 CFR 52.21 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD	WP01	Wet Electrostatic Precipitator
			C11A	Regenerative Thermal Oxidizer
			C11B	Regenerative Thermal Oxidizer
RD02	Wood Flake Rotary Dryer # 2 [Line 1 Single-Pass Dryer]	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b) 40 CFR 52.21 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD	WP01	Wet Electrostatic Precipitator
			C11A	Regenerative Thermal Oxidizer
			C11B	Regenerative Thermal Oxidizer

C. Equipment & Rule Applicability

Wood Flake Rotary Dryers (RD01 and RD02)

Norbord Georgia LLC – Cordele (Norbord) is seeking authorization to replace two existing triple-pass dryers with two new single-pass dryers.

Triple-pass rotary dryers as the name suggest consists of three drums of differing diameters nested inside one another. The dryer is not set on a slope, but rather relies on pneumatic conveying to carry the wood flakes through the unit. Wood flakes are fed into the innermost drum and proceeds to the end of innermost drum and falls into the middle drum. The wood flakes proceed to the end of the middle drum and falls to the outermost drum, where it moves through and is discharged at the end. Triple-pass dryers are generally employed for high-moisture applications where longevity is less of a concern. As such, they are often used in drying biomass because their retention time in the dryer is longer compared to single-pass dryers. Triple-pass dryers allow the drum length to be reduced, allowing a smaller footprint. The initial investment for triple-pass dryers is less compared to single-pass dryers.

Single-pass rotary dryers consist of a single, heavy-duty drum through which material and products of combustion are passed while the drum, which is set on a slight slope to allow gravity to assist in moving wood flakes through, rotates. Flights affixed to the drum's interior pick up wood flakes and cascade it through the gas stream as the drum rotates to maximize heat transfer between the wood flakes and products of combustion. Single-pass dryers have increased longevity and reliability because they rely on a single shell which is designed to be much more robust and durable. Single-pass dryers are less prone to clogging because of the larger diameter which, combined with the lifting flights, gives wood flakes adequate space to fall through the air stream that can help to break up any potential clumps. Single-pass dryers do not require as high a velocity to move the wood flakes through, saving

energy. The exhaust gas stream from single-pass dryers requiring off-gas treatment is smaller than for triple-pass dryers due to the reduced air volume utilized.

Each Wood Flake Rotary Dryer is subject to the following rules:

40 CFR 63, Subpart A “General Provisions”

40 CFR 63, Subpart DDDD “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products”

Georgia Rule 391-3-1.02(2)(e) “Particulate Emissions from Manufacturing Processes”

Georgia Rule 391-3-1-.02(2)(b) “Visible Emissions”

Note that each Wood Flake Rotary Dryer is a “green rotary dryer,” as defined by the Plywood and Composite Wood Products (PCWP) MACT rule, and the thermal oxidizer that controls HAP emissions from the dryer must limit emissions of total HAP, measured as THC (as carbon), by 90 percent. The thermal oxidizer must also maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test.

Note that this permit has incorporated the applicable PCWP MACT rule, 40 CFR Part 63, Subpart DDDD changes finalized on August 13, 2020 and August 21, 2020 into the existing Title V operating permit.

D. Permit Conditions

Conditions 3.2.3, 3.2.4, and 3.2.5 were deleted due to the updated language of 40 CFR 63, Subpart DDDD finalized August 2020.

Pursuant to PSD avoidance, new Condition 3.2.21 limits wood flakes dried in the Line 1 Wood Flake Dryers to 332,880 oven dry tons per year (ODT/yr).

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2250(f)], new Condition 3.2.22 requires the Permittee to be in compliance with the compliance options, operating requirements, and the work practice requirements in 40 CFR 63, Subpart DDDD when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are operating except as stated in the paragraphs of the condition.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2250(f) – Table 3, Row (6)], new Condition 3.2.23 requires the Permittee to follow the documented site-specific procedures in the condition for process units and control systems undergoing safety-related shutdown.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2250(g)], new Condition 3.2.24 requires the Permittee to always operate and maintain the Permittee’s affected source, including air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by 40 CFR 63, Subpart DDDD.

Pursuant to PSD avoidance, modified Condition 3.3.5 requires the Permittee to limit the PM emissions from the Line 1 Green Bins (ID Nos. GB01, GB02, GB03, and GB04); the Wellons (ID No. WELL); and the Wood Flake Dryers (ID Nos. RD01, RD02, RD03, and RD04), combined, to 14.54 lb/hr.

Pursuant to PSD avoidance, modified Condition 3.3.6 requires the Permittee to limit the NO_x emissions from the Line 1 Green Bins (ID Nos. GB01, GB02, GB03, and GB04); the Wellons (ID No. WELL); and the Wood Flake Dryers (ID Nos. RD01, RD02, RD03, and RD04), combined, to 37.44 lb/hr.

Pursuant to PSD avoidance, modified Condition 3.3.7 requires the Permittee to limit the CO emissions from the Line 1 Green Bins (ID Nos. GB01, GB02, GB03, and GB04); the Wellons (ID No. WELL); and the Wood Flake Dryers (ID Nos. RD01, RD02, RD03, and RD04), combined, to 77.40 lb/hr.

Pursuant to PSD avoidance, modified Condition 3.3.8 requires the Permittee to limit the VOC (as carbon) emissions from the Line 1 Green Bins (ID Nos. GB01, GB02, GB03, and GB04); the Wellons (ID No. WELL); and the Wood Flake Dryers (ID Nos. RD01, RD02, RD03, and RD04), combined, to 7.20 lb/hr.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2262(b)], modified Condition 4.2.1 requires the Permittee to conduct performance tests only during representative operating conditions of the affected source which excludes periods of startup, shutdown, and malfunction.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2262(d)(1)], modified Condition 4.2.3 requires the Permittee to locate sampling sites at the inlet and outlet of the control device (defined in 40 CFR 63.2292) and prior to any releases to the atmosphere. The phrase “HAP-altering” was removed.

Pursuant to PSD avoidance, new Condition 4.2.10 requires the Permittee to conduct performance test for the indicated pollutants within 180 days after the startup of both Line 1 Wood Flake Dryers (ID Nos. RD01 and RD02). This is necessary to confirm compliance with the emission limits in the permit following the change from triple-pass rotary dryers to single-pass rotary dryers.

Pursuant to PSD avoidance and 40 CFR 63.2262(k), new Condition 4.2.11 requires the Permittee to record during each test run the oven dried tons per hour of wood flakes dried in the Line 1 Wood Flake Dryers (ID Nos. RD01, RD02, RD03, and RD04) and determine and record the average ODT/hr. The Permittee is also required to monitor the firebox temperature of the RTO(s) in operation during testing.

Pursuant to 40 CFR 63.2271-Table 7, Row (7), new Condition 4.2.12 requires the Permittee to conduct a repeat performance test for the Wood Flake Dryers (ID Nos. RD01, RD02, RD03, RD04, RD05, and RD06) controlled by RTOs C11A, C11B, C201A, and C201B using the applicable method(s) specified in Condition 4.1.3 and Table 4 to 40 CFR 63, Subpart DDDD by August 13, 2023 or within 60 months following the previous performance test, whichever is later, and thereafter within 60 months following the previous performance test. Note that this testing requirement is for both the Line 1 and the Line 2 dryers.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2269(b)(1-6)], modified Condition 5.2.2 requires the Permittee to meet the indicated requirements for the temperature monitoring device.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2270(b), (c), (d), and (f)], modified Condition 5.2.3 requires the Permittee to monitor and collect data as indicated.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2271(a), Table 7, Row 1, and Table 2, Rows 1, 2], modified Condition 5.2.4 requires the Permittee to collect and record the firebox temperature for the RTOs and the TCOs in accordance with Conditions 5.2.2, 5.2.2, and 5.2.3. The Permittee is required to maintain each temperature above the minimum established for each oxidizer.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2271(a), Table 7, Row 4, and Table 2, Row 2], modified Condition 5.2.5 requires the Permittee to check the activity level of a representative sample of each catalyst in each thermal catalytic oxidizer (ID Nos. RT63 and C202) at least annually and take any necessary corrective action to ensure that the catalyst is performing within its design range. The Permittee may forego the annual catalyst activity check if a performance test is conducted according to Table 4 of 40 CFR 63, Subpart DDDD.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2271(b)(3, 4)], modified Condition 5.2.6 requires the Permittee to report each instance in which an oxidizer temperature is less than that established for that oxidizer; each instance in which the activity level of the catalyst in either thermal catalytic oxidizer is not checked at least annually; and each instance in which a HAP coating is used during the finishing operations. Also, startups, shutdowns, and malfunctions as well as control device maintenance are to be reported as deviations.

VII. Other Record Keeping and Reporting Requirements

Condition 6.1.7.c.vii is modified to match the language of 40 CFR 63, Subpart DDDD more accurately, by defining a reportable excursion to be any annual period in which the activity level of a representative sample of catalyst is not checked rather than the 12-month period previously indicated.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2281(a)], modified Condition 6.2.6 requires the Permittee to submit each report in the table that is applicable to the Permittee.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2281(b)], modified Condition 6.2.7 requires the Permittee to submit each report by the date in Table 9 of 40 CFR 63, Subpart DDDD as specified in the condition.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2281(c)], modified Condition 6.2.8 requires the Permittee to ensure that the compliance report required contains the information indicated.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2281(d)], modified Condition 6.2.9 requires the Permittee to ensure that the information in the compliance report includes the information in Paragraphs a. through f. of Condition 6.2.8 and Paragraphs a. and b. of Condition 6.2.9 where the Permittee is not using a CMS to show compliance.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2281(e)], modified Condition 6.2.10 requires the Permittee to ensure that the information in the compliance report includes the information in Paragraphs a. through e. of Condition 6.2.8 and Paragraphs b. through m. of Condition 6.2.10 where the Permittee is using a CMS to show compliance.

Pursuant to the updated language of 40 CFR 63, Subpart DDDD [40 CFR 63.2282(a)], modified Condition 6.2.12 requires the Permittee to keep the records indicated in the condition.

Pursuant to 40 CFR 63.2250(f), 40 CFR 63.2282(a) and Table 3(6), new Condition 6.2.15 requires the Permittee to follow documented site-specific procedures to cease the flow of raw materials and fuel or process heat and to remove material from the process unit(s) as expeditiously as possible to reduce air pollutant emissions. The Permittee is required to keep records to show that the work practice requirements are followed during safety-related shutdowns.

Pursuant to 40 CFR 63.2280(d), new Condition 6.2.16 requires the permit to submit a Notice of Compliance Status as specified in 40 CFR 63.2281(h), (k) and (l) if the Permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 of 40 CFR 63, Subpart DDDD, or a repeat performance test as specified in Table 7 of 40 CFR 63, Subpart DDDD, as indicated in the condition.

Pursuant to 40 CFR 63.2283, new Condition 6.2.17 requires that records required by Condition 6.2.12 be maintained for five years.

New Conditions 6.2.18 and 6.2.19 require that the Permittee keep records of the monthly and 12-consecutive month total wood flakes dried in the in the Line 1 Wood Flake Dryers (ID Nos. RD01, RD02, RD03, and RD04). These records are necessary to demonstrate compliance with the PSD avoidance limit specified in Condition 3.2.21.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//